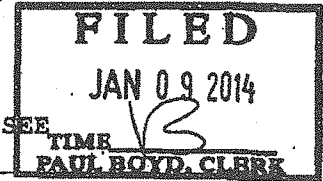


IN THE PROBATE COURT OF SHELBY COUNTY, TENNESSEE



Joyce Jackson,

PLAINTIFF/COUNTER-DEFENDANT,

VS.

Guardianship Group Life Insurance,

DEFENDANT/COUNTER-PLAINTIFF.

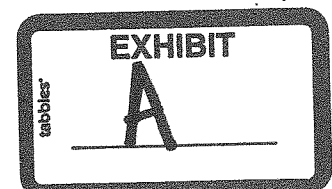
NO. **PR-179**  
Division/Part:

ACTION TO RECOVER BENEFICIARY PAYMENT

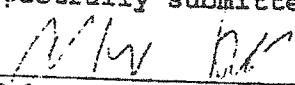
Comes now Joyce Jackson, a resident of Shelby County TN. She was named the beneficiary on her brothers policy Richard Jackson.

1. By policies numbered under the Guardianship Group Life Insurance 421511 made by the Defendant in consideration of the payment of premiums by Richard Jackson as therein provided, the Defendant was the Beneficiary on the life of Richard Jackson in the aggregate sum of \$60,000.00 payable to the Plaintiff, as beneficiary, upon due proof of the death of Richard Jackson. (See attached Death Certificate.)
2. The premiums due on the policies were all fully paid up, and on June 3, 2013, while the policies remained in force, Richard Jackson died.
3. Due proof of his death was produced by the Plaintiff to the Defendant and the sum of \$60,000.00 became payable by the Defendant to the Plaintiff, but no part thereof has been paid. If funds have been paid they were paid on a forged signature of the deceased.
4. All conditions precedent have been performed or have occurred.

Wherefore the Plaintiff demands judgment against the defendant in the sum of \$60,000.00 dollars, interest, cost and disbursements.



Respectfully submitted,

  
\_\_\_\_\_  
R. G. SIMS #13054

Attorney for Defendant

1279 Lamar Avenue

Memphis, TN 38104

(901) 725-7132/7135

**PROBATE COURT OF TENNESSEE**  
**140 ADAMS AVENUE, ROOM 124, MEMPHIS, TENNESSEE 38103**  
**FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**  
**SUMMONS IN CIVIL ACTION**

NO. PR-179

Joyce

Jackson

Home Address

PLAINTIFF

Business Address

VS

Guardian Life Insurance Company

Serve Commissioner of Insurance Dept of Com

of America

Home Address

500 James Pkwy, Nashville, TN 37243

DEFENDANT

Business Address

TO THE DEFENDANT(S): Guardian Life Insurance Company of America

You are hereby summoned and required to defend a civil action by filing your answer with the Clerk of the Court and serving a copy of your answer to the Petition/Complaint on recovery of beneficiary payment

Petitioner's attorney, whose address is Kim G. Sims, 1279 Lamar Ave, Mphs, TN 38104, (901) 725-7132 within THIRTY (30) DAYS after this summons has been served upon you, not including the day of service. If you fail to do so, a judgment by default may be taken against you for the relief demanded in the Petition/Complaint.

ISSUED

February 14 20 14

By

PAUL BOYD, Clerk

**TO THE DEFENDANT(S):**

NOTICE: Pursuant to Chapter 919 of the Public Acts of 1980, you are hereby given the following notice: Tennessee law provides a four thousand dollar (\$4,000) personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or garnishment issued prior to filing of the list. Certain items are automatically exempt by law and do not need to be listed: these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek counsel of a lawyer.

**RETURN OF SERVICE OF SUMMONS**

**I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:**

By delivering on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ m. a  
copy of the summons and a copy of the Petition/Complaint to the following defendant(s) \_\_\_\_\_  
\_\_\_\_\_

Bill Oldham, Sheriff:

By \_\_\_\_\_ Deputy Sheriff

**PRIVATE PROCESS SERVER**

**I HEREBY CERTIFY THAT I HAVE SERVED THE WITHIN SUMMONS:**

By delivering on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ m. a  
copy of the summons and a copy of the Petition/Complaint to the following defendant(s) \_\_\_\_\_  
\_\_\_\_\_

(PLEASE PRINT THE FOLLOWING)

Private Process Server \_\_\_\_\_

Address \_\_\_\_\_

Company \_\_\_\_\_

Telephone \_\_\_\_\_

Other manner of service: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature \_\_\_\_\_

**SERVICE NOT TO BE FOUND**

I hereby certify that I have **NOT** served this Summons on the within named defendant(s)

\_\_\_\_\_ because \_\_\_\_\_

is (are) not to be found in this County after diligent search and inquiry for the following reasons:

This \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.

Private Process Server \_\_\_\_\_

OR

Bill Oldham, Sheriff, by Deputy Sheriff \_\_\_\_\_

**STATE OF TENNESSEE**  
**Department of Commerce and Insurance**  
**500 James Robertson Parkway**  
**Nashville, TN 37243-1131**  
**PH - 615.532.5260, FX - 615.532.2788**  
**Jerald.E.Gilbert@tn.gov**

March 07, 2014

Guardian Life Insurance Company Of Am  
2908 Poston Avenue, % Corp. Svc. Comp.  
Nashville, TN 37203  
NAIC # 64246

Certified Mail  
Return Receipt Requested  
7012 3460 0002 8942 3074  
Cashier # 13709

Re: Joyce Jackson V. Guardian Life Insurance Company Of Am

Docket # P.R. 179

To Whom It May Concern:

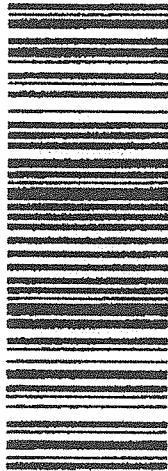
Pursuant to Tennessee Code Annotated § 56-2-504 or § 56-2-506, the Department of Commerce and Insurance was served January 14, 2014, on your behalf in connection with the above-styled proceeding. Documentation relating to the subject is herein enclosed.

Jerald E. Gilbert  
Designated Agent  
Service of Process

Enclosures

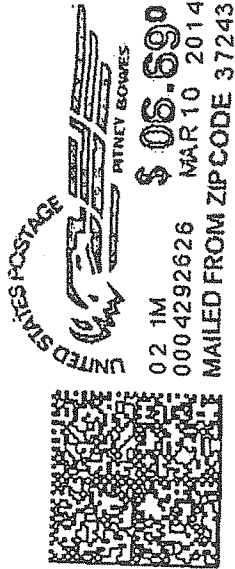
cc: Probate Court Clerk  
Shelby County  
140 Adams Street, Room 124  
Memphis, Tn 38103

State of Tennessee  
Dept. of Commerce & Insurance  
Service of Process  
500 James Robertson Parkway  
Nashville, TN 37243



7012 3460 0002 8942 3074

FIRST CLASS



7012 3460 0002 8942 3074 3/7/14  
GUARDIAN LIFE INSURANCE COMPANY, INC. AN  
2908 POSTON AVENUE, % CORP. SVC. CO.  
NASHVILLE, TN 37203

3720331312 0025

